

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PARAMOUNT PICTURES
CORPORATION; WARNER BROS.
ENTERTAINMENT INC.; TWENTIETH
CENTURY FOX FILM CORPORATION;
COLUMBIA PICTURES INDUSTRIES,
INC.; UNIVERSAL CITY STUDIOS LLC;
UNIVERSAL STUDIOS HOME
ENTERTAINMENT LLC; and DISNEY
ENTERPRISES, INC.,

Plaintiffs,

v.

JOHN DOES, JANE DOES and/or XYZ
CORPORATIONS d/b/a MOVIE TUBE; and
JOHN DOES, JANE DOES and/or XYZ
CORPORATIONS 2-100,

Defendants.

CIVIL ACTION NO. 15-CV-5819 (PAC)

REQUEST FOR ENTRY OF DEFAULT

TO: RUBY J. KRAJICK, CLERK OF COURT
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Plaintiffs Paramount Pictures Corporation, Warner Bros. Entertainment Inc., Twentieth Century Fox Film Corporation, Columbia Pictures Industries, Inc., Universal City Studios LLC, Universal Studios Home Entertainment LLC, and Disney Enterprises, Inc. (collectively, “Plaintiffs”) respectfully request entry of default, pursuant to Fed. R. Civ. P. 55(a), against the defendants John Does, Jane Does and/or XYZ Corporations d/b/a MovieTube and John Does, Jane Does and/or XYZ Corporations 2-100 (“Defendants”) in this lawsuit for their failure to appear or otherwise respond to the Complaint within the time specified by the Federal Rules. On July 29, 2015, the Complaint, Summonses and all other initiating documents in this lawsuit were

served on Defendants via email, pursuant to the Order Granting Leave to Serve Process by Email entered by the Court on July 29, 2015 [Dkt. No. 11]. An affidavit certifying that the forgoing service was completed on July 29, 2015 was filed with the Court on August 17, 2015 [Doc. No. 34]. *See* Affidavit of George P. Wukoson, dated Aug. 20, 2015 (“Wukoson Aff.”) ¶ 2.

More than 21 days have elapsed since service was performed. Upon information and belief, none of Defendants are infants, in the military or incompetent persons. Wukoson Aff. ¶ 3. Defendants have not been granted any extension of time to respond to the Complaint. Wukoson Aff. ¶ 4. Defendants have failed to answer or otherwise respond to the Complaint, or serve any answer or other response on Plaintiffs’ attorneys of record. Wukoson Aff. ¶ 5.

A proposed Certificate of Default is submitted herewith for the Court’s convenience.

Dated: August 20, 2015

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

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Home Entertainment LLC, and
Disney Enterprises, Inc.